

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(at Greenbelt)**

**IN RE:**

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**Mouri Ferreira**

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**Case No. 18-10882-LSS  
Chapter 13**

**Debtor**

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\* \* \* \* \*

**Mouri Ferreira**

\*

**Movant**

\*

**vs.**

\*

**LEWANDOWSKI FAMILY, LLC**

\*

**2 Kettle Pond Court**

**Potomac, MD 20854**

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**SERVE:**

**Charles A. Lewandowski, Resident Agent**

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**2 Kettle Pond Court**

**Potomac, MD 20854**

\*

**Respondent**

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\* \* \* \* \*

**NOTICE OF DEBTOR'S MOTION TO AVOID A JUDICIAL LIEN  
PURSUANT TO 11 U.S.C. SECTION 522(f) AND HEARING THEREON**

A motion was filed on behalf of the debtor to avoid a lien held by LEWANDOWSKI FAMILY, LLC. Your rights may be affected. You should read these papers carefully and discuss them with your lawyer. (If you do not have a lawyer, you may wish to consult one.) A copy of the motion is attached.

If you do not want the Court to grant the motion, or if you want the Court to consider your views on the motion, then by **April 20, 2018**, you or your lawyer must file with the Clerk of the Bankruptcy Court a response to the motion explaining your position and mail a copy of the response to:

Terence Brian Garvey, Esquire  
839C Quince Orchard Blvd  
Gaithersburg, MD 20878.

If you mail, rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above.

If you file a timely response to the motion, the hearing on the motion will take place on **May 23, 2018**, at **10:00 A.M.**, in Courtroom **3-D**, United States Courthouse, 6500 Cherrywood Lane, Greenbelt, MD 20770.

If you or your lawyer do not file and serve a timely response to the motion, the Court may find that you do not oppose the relief sought in the motion and may grant or otherwise dispose of the motion before the scheduled hearing date.

DATE March 23, 2018

/s/ Terence Brian Garvey  
TERENCE BRIAN GARVEY, ESQ.  
Federal Bar No. 07737  
839C Quince Orchard Blvd  
Gaithersburg, MD 20878  
Telephone: 301-948-1227  
Facsimile: 301-948-0002  
Email: tgarveylaw@comcast.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 23<sup>rd</sup> day of March, 2018, that to the extent the following were not served via the CM/ECF system, true copies of the foregoing Notice of Motion were mailed, postage prepaid, to the names and addresses set forth below:

LEWANDOWSKI FAMILY, LLC  
Charles A. Lewandowski, Resident Agent  
2 Kettle Pond Court  
Potomac, MD 20854

Office of the U.S. Trustee  
6305 Ivy Lane, Suite 600  
Greenbelt, MD 20770

Timothy P. Branigan, Chapter 13 Trustee  
9891 Broken Lane Parkway, Suite 301  
Columbia, MD 21046

/s/ Terence Brian Garvey  
TERENCE BRIAN GARVEY, ESQ.